

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 7/13/2023

Briefing shall take place on the schedule set out in this letter.


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July 12, 2023

VIA ECF

The Honorable Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 415
New York, NY 10007

Re: *Bose v. Young Adult Institute, Inc. d/b/a YAI*
Case No. 1:23-cv-00496-VSB

Dear Judge Broderick:


This firm represents defendant Young Adult Institute, Inc. d/b/a YAI (“Defendant”) in the above-referenced action. Pursuant to Your Honor’s June 7, 2023, Order, the Defendant writes to inform the Court that it wishes to file a new motion to dismiss. Plaintiff has raised entirely new allegations, withdrew some allegations that were mentioned in the original Complaint, and included a second Plaintiff, Rashelle Mansfield, in the Amended Complaint. After conferring with opposing counsel, the Parties propose the following schedule concerning the Defendant’s anticipated motion:

- Thursday, August 3, 2023 – Defendant files moving papers.
- Thursday, August 24, 2023 – Plaintiffs oppose Defendant’s anticipated motion.
- Thursday, September 7, 2023 – Defendant files reply papers.

Plaintiffs consent to the above-referenced briefing schedule. Thank you for Your Honor’s consideration.

Respectfully submitted,

CLIFTON BUDD & DeMARIA, LLP
Attorneys for the Defendant


By: Ian-Paul A. Poulos

VIA ECF

LEE LITIGATION GROUP
Attorneys for the Plaintiffs